

REMARKS

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. Claim 15 has been amended. Claims 15, 16, 18, 19 and 21-24 are pending.

The Examiner rejected claims 15-16, 18-19, 21-24 under 35 U.S.C. §103 as being unpatentable over U.S. Patent No. (5,675,364) issued to Stedman et al. in view of U.S. Patent No. (5,455,561) issued to Brown further in view of Ng (5,731,832). For at least the reasons set forth below, Applicants submit that claims 15, 16, 18, 19 and 21-24 are not rendered obvious by *Stedman, Brown* and *Ng*.

As is clearly set forth at Section 706.02(j) of the M.P.E.P., the following three basic criteria must be met in order for the Examiner to establish a prima facie case of obviousness:

1. There must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings;
2. There must be a reasonable expectation that combining the references would successfully result in the claimed invention; and
3. The prior art references when combined must teach or suggest all limitations of the claims under examination.

The teaching or suggestion to make the claimed combination and the reasonable expectation of success must be found in the prior art and not based on applicant's disclosure. See *In re Vaeck*, 947 F.2d 488, 20 U.S.P.Q.2d 1438 (1991).

Claim 15 recites a computer system that includes:

a memory to store a weighted average of brightness corresponding to one or more frames representing a view at different times; and

a processor coupled to the memory to cause the computer system to transition from an active mode to an inactive mode in response to a predetermined period of inactivity and to compare the property of two frames to each other while the computer system is in the inactive mode and cause the computer system to exit the inactive mode in response to the weighted average of brightness of the two frames differing by a predetermined amount.

Claim 22 recites a method that includes:

- causing the computer system to transition from an active mode to an inactive mode in response to a predetermined period of inactivity;
- receiving a first frame corresponding to a view at a first time while in the inactive mode;
- determining a weighted average brightness for the first frame;
- receiving a second frame corresponding to a view at a second time while in the inactive mode;
- determining a weighted average brightness for the second frame; and
- causing the computer system to exit the inactive mode if the weighted average brightness for the first frame differs from the weighted average brightness for the second frame by a predetermined amount.

Thus, Applicants claim causing the computer system to transition from an active mode to an inactive mode in response to a predetermined period of inactivity and comparing two frames to each other while the computer system is in the inactive mode and causing the computer system to exit the inactive mode in response to the weighted average of brightness of the two frames differing by a predetermined amount.

Neither *Stedman*, *Ng*, nor *Brown* disclose comparing two frames while a computer system is in an inactive mode and causing the computer system to exit the inactive mode in response to the weighted average of brightness of two frames differing by a predetermined amount.

Furthermore, there is no suggestion or motivation to modify or combine the references in the manner stated in the Office Action. There is no suggestion to combine *Stedman*'s computer system with *Brown*'s teachings related to security monitors. There is no suggestion to combine *Stedman*'s computer system with *Ng*'s teachings related to video signal imaging. Therefore,

whether taken individually or in combination, *Stedman*, *Ng*, and *Brown* do not disclose, teach, or suggest the invention as claimed in claims 15 and 22.

Stedman discloses a computer system that provides a wakeup control function.

Stedman's system remains in a power saving mode of operation until a wakeup signal is generated by an I/O controller 40. More specifically, when I/O controller 40 receives an indication of action from either keyboard 76 or mouse 78, I/O controller 40 then generates the wakeup signal which signals processor 12 to wake up. See col. 4, lines 36 to 42. *Stedman* does not disclose, teach, or suggest comparing two frames to each other while a computer system is in an inactive mode and causing the computer system to exit the inactive mode in response to the weighted average of brightness of two frames differing by a predetermined amount.

Ng discloses comparing two video frames to determine motion. The system disclosed by *Ng* compares video frames on a pixel-by-pixel basis. *Ng* does not disclose, teach, or suggest comparing two frames to each other while a computer system is in an inactive mode and causing the computer system to exit the inactive mode in response to the weighted average of brightness of two frames differing by a predetermined amount.

Brown discloses a security surveillance system to monitor a scene. See col. 4, lines 5-6. The surveillance system uses the size of the change between frames and the duration of the change to discriminate between nuisance changes and those changes that represent a breach of safety. See col. 4, lines 10-13. *Brown*'s system does not exit an inactive mode when a change is detected. When *Brown* detects a change between frames, the system enters another stage of processing. See col. 4, line 53 to col. 5, line 5. Therefore, *Brown* does not disclose, teach, or suggest comparing two frames to each other while a computer system is in an inactive mode and causing the computer system to exit the inactive mode in response to the weighted average of brightness of the two frames differing by a predetermined amount.

Neither *Stedman*, *Ng*, nor *Brown* disclose, teach, or suggest comparing two frames to each other while a computer system is in an inactive mode and causing the computer system to exit the inactive state in response to the weighted average of brightness of the two frames differing by a predetermined amount. These features are expressly recited in claims 15 and 22. Therefore, whether taken individually or in combination, *Stedman*, *Ng*, and *Brown* do not disclose, teach, or suggest the invention as claimed in claims 15 and 22.

Furthermore, there is no suggestion or motivation to modify or combine the references in the manner stated in the Office Action. The Office Action states that it would have been obvious to modify the system in *Stedman* by the teachings of *Brown* in order to provide a system which can recognize different mode by comparing the property of two frames. Applicants traverse. *Stedman* discloses a computer system with a display wakeup function controlled by an I/O controller. There is no suggestion to modify *Stedman*'s system to include a video camera or to compare the weighted average brightness of two frames. *Brown* discloses a video surveillance system to monitoring a scene for security reasons. There is no suggestion to modify *Brown*'s system to be used with a computer system, to compare the weighted average brightness of two frames, and to exit a computer system's inactive mode in response to the weighted average brightness of the two frames differing by a predetermined amount. Furthermore, there is no suggestion to combine *Stedman*'s computer system with *Brown*'s teachings related to security monitors.

The Office Action states that it would have been obvious to modify the system in *Stedman* and *Brown* by the teachings of *Ng* in order to provide a system capable of immediately identifying changes in an image represented by a video signal. Applicants traverse. *Ng* discloses an apparatus for detecting motion in a video signal. There is no suggestion to modify *Ng*'s system to be used with a computer system with a processor to cause the computer system to

transition from an active mode to an inactive mode and to compare the weighted average of the two frames while the computer system is in the inactive mode. Furthermore, there is no suggestion to combine *Stedman*'s computer system with *Ng*'s teachings related to video signal imaging. Therefore, whether taken individually or in combination, *Stedman*, *Ng*, and *Brown* do not disclose, teach, or suggest the invention as claimed in claims 15 and 22.

Claims 15 and 22 are patentable over *Stedman*, *Ng* and *Brown* for at least the reasons set forth above. Claims 16, 18, 19 and 21 depend from claim 15. Claims 23 and 24 depend from claim 22. Because dependent claims include the limitations of the claims from which they depend, Applicants submit that claims 16, 18, 19, 21, 23, and 24 are patentable over *Stedman*, *Ng* and *Brown* for at least the reasons set forth above.

Conclusion

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 15-16, 18-19, 21-24 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number

02-2666.

Respectfully submitted,
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Date: 6/25/02

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MARKED-UP CLAIM AMENDMENTS

IN THE CLAIMS

15. (Thrice Amended) A computer system comprising:
- a memory to store a weighted average of brightness corresponding to one or more frames representing a view at different times; and
 - a processor coupled to the memory to cause the computer system to transition from an active mode to an inactive mode in response to a predetermined period of inactivity and to compare the weighted average of brightness of two frames to each other while the computer system is in the inactive mode and to cause the computer system to exit the inactive mode in response to the weighted average of brightness of the two frames differing by a predetermined amount.